

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SCOTT DAVID KOCH, JR.,	:	CHAPTER 13
AKA SCOTT DAVID KOCH,	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
SCOTT DAVID KOCH, JR.,	:	
AKA SCOTT DAVID KOCH,	:	
Respondent	:	CASE NO. 1-22-bk-02498-HWV

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 11th day of December, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

1. The Trustee avers that the Debtor's Plan is not feasible based upon the following:

- a. Insufficient Monthly Net Income as indicated on Schedules I and J.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 11th day of December, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Dawn Marie Cutaia, Esquire
Fresh Start Law, PLLC
1701 West Market Street
York, PA 17404

/s/Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee